



**Scott R. Freiermuth**

Counsel, Government Affairs, Federal Regulatory

**Sprint Corporation**

6450 Sprint Parkway, KSOPHN0304 – 3B521

Overland Park, KS 66251

scott.r.freiermuth@sprint.com – 913-315-8521

May 1, 2017

Marlene H. Dortch, Secretary

Federal Communications Commission

445 Twelfth Street, S.W.

Washington, DC 20554

Re: *Misuse of Internet Protocol (IP) Captioned Telephone Service;  
Telecommunications Relay Services and Speech-to-Speech Services for  
Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24, 03-123

Dear Ms. Dortch:

On April 27, 2017, Mike Ellis, Claudia Gordon, and the undersigned counsel on behalf of Sprint Corporation (“Sprint”) met with Karen Peltz Strauss, Eliot Greenwald, Bob Aldrich, Michael Scott, and Susan Bahr of the Commission’s Consumer and Governmental Affairs Bureau, and Dana Shaffer, Andrew Mulitz and David Schmidt of the Commission’s Office of Managing Director, as well as Henning Schulzrinne of the Commission’s Office of Strategic Planning and Policy Analysis.

The primary purpose of the meeting was to discuss IP-based Captioned Telephone Service (“IP CTS”). Sprint recognized the Commission’s concerns about the growth of the service and its impact on the Interstate TRS Fund. Sprint urged the Commission to carefully examine IP CTS in a holistic fashion taking into account all aspects of the service from consumer registration, to service quality, to new technologies, and the rate/rate-setting methodology. Sprint believes the Commission has many regulatory levers at its disposal and that it should carefully monitor and enforce its existing rules while exploring new user registration requirements, annual re-registration, third-party certification, *etc.* Sprint is open to exploring these and other “outside the box” ideas to address core concerns with IP CTS.

Sprint also cautioned against arbitrary rate reductions that will not provide a sustained impact on controlling the growth of IP CTS. Abandoning the Multistate Average Rate Structure (“MARS”) rate-setting methodology would be an unnecessary departure from a competitively-based rate-setting methodology. An artificial/non-competitive rate could have unintended, negative consequences including diminishing service quality and reducing competition for IP CTS – ultimately harming the consumers that depend on this important

relay service. Additionally, Sprint contends the record regarding alternative cost methodologies is stale; as such, the Commission should refresh the docket with updated information about the current market which has changed significantly since comments were last sought in 2013. Sprint expressed its desire for a careful, deliberative approach to improving IP CTS and believes a Further Notice of Proposed Rulemaking and/or Notice of Inquiry is the best regulatory vehicle for sustained improvements that will ensure a healthy IP CTS for years to come.

Sprint also sought updates on several pending matters including its Waiver of the Speed of Answer measurement for IP CTS in relation to Hurricane Matthew and its Waiver for access to the TRS Numbering database. Finally, Sprint provided a brief update of its efforts to better serve its DeafBlind IP Relay users.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules.<sup>1</sup> In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

*/s/ Scott R. Freiermuth*

---

Scott R. Freiermuth  
*Counsel, Government Affairs,  
Federal Regulatory*

cc: Participants

---

<sup>1</sup> 47 C.F.R. § 1.1206(b)(2).